



**Service of Process
Transmittal**

12/04/2013

CT Log Number 523998878

TO: Margaret Lesesne
The Neiman-Marcus Group, Inc.
1618 Main St
Dallas, TX 75201

RE: Process Served in Virginia

FOR: The Neiman Marcus Group LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Jackie Friederich, Pltf. vs. The Neiman Marcus Group, etc., Dft.
Name discrepancy noted.

DOCUMENT(S) SERVED: Summons, Complaint

COURT/AGENCY: Fairfax County Circuit Court, VA
Case # CL20130016711

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - On December 6, 2012

ON WHOM PROCESS WAS SERVED: C T Corporation System, Glen Allen, VA

DATE AND HOUR OF SERVICE: By Process Server on 12/04/2013 at 09:30

JURISDICTION SERVED: Virginia

APPEARANCE OR ANSWER DUE: Within 21 days after service

ATTORNEY(S) / SENDER(S): John D. McGavin
3920 University Drive
Fairfax, VA 22030
703-385-1000

ACTION ITEMS: CT has retained the current log, Retain Date: 12/05/2013, Expected Purge Date: 12/10/2013
Image SOP
Email Notification, Margaret Lesesne margaret_lesesne@neimanmarcus.com
Email Notification, Kim Yee KIM_YEE@NEIMANMARCUS.COM
Email Notification, Brenda Sanders BRENDA_SANDERS@NEIMANMARCUS.COM
Email Notification, Margaret Lesesne margaret_lesesne@neimanmarcus.com
Email Notification, Linda Upton Linda_Upton@neimanmarcus.com
Email Notification, Sara Mayes sara_mayes@neimanmarcus.com
Email Notification, Tracy Preston Tracy_Preston@neimanmarcus.com

SIGNED: C T Corporation System
PER: Lisa Uttech
ADDRESS: 4701 Cox Road
Suite 285
Glen Allen, VA 23060
TELEPHONE: 804-217-7255

Page 1 of 1 / RK

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Certified mail receipts confirm receipt of contents.

EXHIBIT

A

COMMONWEALTH OF VIRGINIA
CIRCUIT COURT OF FAIRFAX COUNTY
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030
703-691-7320
(Press 3, Press 1)

Jackie Friederich vs. Neiman Marcus Group, The

CL-2013-0016711

TO: Neiman Marcus Group, The
d/b/a Neiman Marcus
Serve: CT Corporation System
4701 Cox Rd., Suite 285
Glen Allen VA 23060

SUMMONS – CIVIL ACTION

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the Clerk's office of this Court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment or decree against such party either by default or after hearing evidence.

APPEARANCE IN PERSON IS NOT REQUIRED BY THIS SUMMONS.

Done in the name of the Commonwealth of Virginia, on Tuesday, November 05, 2013.

JOHN T. FREY, CLERK

By: 
Deputy Clerk

Plaintiff's Attorney John D. McGavin

VIRGINIA

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
CIVIL INTAKE

2013 NOV - 1 PM 3: 47

JACKIE FRIEDERICH

Plaintiff

vs.

Case No. **2013 16711**

THE NEIMAN MARCUS GROUP d/b/a
NEIMAN MARCUS

SERVE: CT Corporation System
4701 Cox Rd., Suite 285
Glen Allen, VA 23060
(Henrico County)

Defendant

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

COMPLAINT FOR NEGLIGENCE

COMES NOW, Jackie Friederich, and hereby moves for judgment against the defendant The Neiman Marcus Group d/b/a Neiman Marcus ("Neiman Marcus") and in support thereof states as follows:

1. Jackie Friederich is a resident of Reston, Virginia and is the plaintiff herein.
2. Neiman Marcus is a retail store which operates a location at Tysons Corner in Fairfax County, Virginia.
3. This court has jurisdiction to hear this matter as it arises out of a tort which occurred in the Commonwealth of Virginia and Fairfax County at the retail store operated by Neiman Marcus.
4. Jackie Friederich was an invitee of the Neiman Marcus store in Tysons Corner on December 6, 2012.
5. She entered the store during regular business hours for purposes of purchasing clothing.
6. The store employees and their staff acting within the scope of their employment, had an absolute duty to keep the premises reasonably safe from defects and/or in the alternative to warn

7. Notwithstanding the duties of the defendant and its employees, Neiman Marcus failed to keep the premises reasonably safe and created a hazard which was not readily visible and was obstructed from view and was a defect in the premises of the store within their control.

8. Jackie Friederich, while exercising ordinary care for her own safety suffered a trip and a fall as a direct and proximate result of the negligence of the defendant and fell to the ground suffering serious personal injury.

9. As a direct and proximate result of the incident described and as a result of the negligence of the defendants, Jackie Friederich has suffered severe personal injury, disfigurement, pain and suffering, inconvenience, medical expenses, surgery and loss of functional capacity. All of her injuries are continuing and permanent and will require future medical expenses and medical care. All of which are directly and proximately related to the subject incident.


10. Jackie Friederich demands trial by jury on all issues joined in this incident.

WHEREFORE, the foregoing considered, Jackie Friederich, by counsel, moves this court for entry of a judgment against the defendant in the amount of \$750,000 and her costs and prejudgment interest from December 6, 2012, post judgment interest from the date of any verdict until paid.

JACKIE FRIEDERICH

By Counsel

BANCROFT, MCGAVIN, HORVATH & JUDKINS, P.C.
3920 University Drive
Fairfax, Virginia 22030
(703)385-1000
(703)385-1555 Facsimile



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jmcgavin@bmhlaw.com
Counsel for Plaintiff